IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

VS.

-----,

CITY OF JOHNSON CITY, TENNESSEE; KARL TURNER, individually, and in his official capacity as Chief of the Johnson City Police Department; KEVIN PETERS, individually, and in his official capacity as Captain in the Johnson City Police Department; TOMA SPARKS, individually, and in his official capacity as Investigator in the Johnson City Police Department; JUSTIN JENKINS, individually, and in his official capacity as Investigator in the Johnson City Police Department; JEFF LEGAULT, individually, and in his official capacity as Investigator in the Johnson City Police Department; BRADY HIGGINS, individually, and in his official capacity as Investigator in the Johnson City Police Department; and DOES 8-20, inclusive,

Defendants.

CASE NO.

2:23-cv-00071-TRM-JEM

PRETRIAL DISCOVERY DEPOSITION OF

B. P.

(Taken May 23, 2024)

THIS STYLE PAGE CONTINUES

COURT REPORTING AND VIDEO SERVICES

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22	0.	Okav.	Do	you	know	who	Kevin	Peters	is?
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- 23 A. I have seen the name, but I don't know him personally.
- 24 | Q. Do you know what he does?
- 25 A. I believe he was the chief of police or is.

B. P. DIRECT - RADER

248

- Q. Do you know anything about anything that he is
 personally alleged to have done in connection with the
 lawsuit that you filed?
 - A. I do not.

4

- Q. I will represent to you that he is not and never was the chief of police. Do you have any idea what his job is?
- 8 A. I must have had it wrong, so no.
- 9 Q. Do you have any idea what his job ever was?
- 10 A. No.
- 11 Q. Can you name any fact with respect to Mr. Peters of anything that he did wrong at any time?
- 13 MS. KRAMER: Objection.
- 14 A. No.
- 15 Q. Can you identify any witness of any kind that has

 16 information that Mr. Peters did anything wrong at any

 17 time?
- 18 A. No.
- 19 Q. Can you identify any document or other form of evidence 20 that bears on whether or not Mr. Peters did wrong at 21 any time?
- 22 MS. KRAMER: Objection.
- 23 A. No.
- Q. Can you identify any witness who has any evidence at all that any member of the Johnson City Police
 - B. P. DIRECT RADER

1		Department at any time took money or accepted money
2		from Mr. Williams?
3	MS.	KRAMER: Objection.
4	A.	No.
5	Q.	Can you identify any witness with knowledge that anyone
6		from the Johnson City Police Department is corrupt in
7		any way?
8	MS.	KRAMER: Objection.
9	Α.	No.
10	Q.	Can you identify any document or other evidence that
11		suggests that anyone from the Johnson City Police
12		Department took money from Mr. Williams?
13	MS.	KRAMER: Objection.
14	A.	No.
15	Ω.	Can you identify any document or other evidence that
16		anyone from the Johnson City Police Department is
17		corrupt in any way?
18	MS.	KRAMER: Objection.
19	A.	No.
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в. Р

DIRECT - RADER

CERTIFICATE

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of B. P. was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 3rd day of June, 2024.

COURT COURT OF TENNES

Rebecca Overbey
LICENSED COURT REPORTER
State of Tennessee
LCR #078

My License Expires:

June 30, 2026

CERTIFIED ONLY IF AFFIXED SEAL IS GREEN